UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

James Andrew Grimmer Secured Party Creditor, Sui Juris, In Propria Persona,

Case File No. 0:25-cv-02758-ECT-DLM

Plaintiff,

DEFENDANT'S MOTION TO DISMISS PLAINTIFF'S COMPLAINT

v.

Citibank, N.A.,

Defendant.

Pursuant to Fed. R. Civ. P. 12(b)(6), Defendant moves to dismiss all of Plaintiff's claims in their entirety with prejudice for failure to state a claim upon which relief can be granted. This motion is supported by the accompanying memorandum of law and any other papers and records filed by Defendant in accordance with the Federal Rules of Civil Procedure, the Local Rules of the District of Minnesota, and Judge Eric C. Tostrud's Practice Pointers. This motion is further supported by the arguments which may be presented at the hearing on this motion if the Court elects to hold a hearing.

Dated: July 23, 2025 BALLARD SPAHR LLP

By: /s/ Kathryn E. Wendt

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